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I. BACKGROUND OF THE COMMENTER.

Michael E. Dickerson is a public citizen who has been using MURS (Multi-Use Radio Service) for 2 years, shortly after its first organization.

Michael uses MURS for non business, personal short range communications as an alternate to Citizen's Band 11 meter frequencies due to the constant problems of skip due to other users running high powered radios and amplifiers. Michael has tried other Citizen's Bands such as FRS (Family Radio Service) but has not had the results of range and other users interfering.

3. Michael is opposing "PRSG's petition for reconsideration" due to wording, and previous rulings, along with the how the changes would affect things.

II OPPOSITION TO NEW STANDARDS IN PERFORMANCE REQUIREMENTS

4. In the MO&O/SR&O, the Commission established entirely new performance standards for MURS radios first type-approved after adoption of these new rules. In rule 95.1307(d), the FCC identifies a particular requirement for pre-transmission monitoring:

"MURS users shall take reasonable precautions to avoid causing harmful interference. This includes monitoring the transmitting frequency for communications in progress and such other measures as may be necessary to minimize the potential for causing interference."

5. Although I agree with this sort of device, making new regulations in regards to putting these into radios will drive current production times up. Along with this these radios will take longer to hit the market. This will hinder MURS radio manufacturing production therefore, hindering the economy.

6. My stance on this is that placing this in new radios is not going to help those already using the radios. Monitoring before transmitting is not done at this time by many businesses who use the MURS frequencies and think they have a private frequency. It is not fair to the current users to make a rule, which will only affect new radios and will still have them out in the dark getting "walked on". Any citizen can go on the internet or to a radio store and locate a radio which claims to be MURS and begin using it like a CB is used these days. MURS users are proud to have a special VHF band, and don't want MURS to become a place for everyone to "walk" on each other on purpose.

7. This method of interference elimination is only a way of eliminating interference from newer radios this will not help older radios. There are several hundreds if not thousands of users who have radios out there right now who will have the ability to transmit freely at will without turning the tones or other means of eliminating noise of other users not using the same tone.

8. Although not totally against the use of such a device a further petition needs to be considered in this matter also involving manufacturers and businesses using MURS which suggestions of this type of device could come about.

9. The PRSG stated in their petition "The requirement should be that no MURS station should be hardware enabled to transmit IF that station's associated receiver is in any form of selective muting. This should include ALL muting protocols, those currently in use (such as CTCSS, DCS, tone-burst, etc.) and any future muting protocols." I believe that all radios which are currently already in production with type certification or acceptance should be grandfathered in, such as the older models were when the rules changed affecting TPO, and ERP in previous petitions. If radios are not grandfathered in it is my suggestion that another method be considered. Many users will refuse to turn in their radios for a minor upgrade to change them so they will not transmit unless the channel is clear even if the company offers a free hardware upgrade if shipped to their facility. No one wants to mess with the hassle of risking your radios getting lost along with pricey insurance and shipping fees.

10. It is my suggestion that further time is taken to providing the public and manufacturers with information on what is expected and the manufacturers have time to get back with information on this sort of device or hardware.

III. OPPOSITION TO LICENSES PREVIOUS GRANTED THAT EXCEED CURRENT PRIVILEGES PERMITTED UNDER THE NEW RULES

11. The PRSG's petition shows that in the MO&O/SR&O the FCC granted some previous licenses previously operating on the now MURS frequencies certain operating privileges which exceed the new rules. The PRSG made several points as to showing ways to Re-license these users and put them into a database available to the public.

I disagree with this for several reasons.

a. These users were told that they would be allowed to use their previous frequencies and power as they were licensed for without paying for a license.

b. The typical user is not concerned about someone else who is running more power or being allowed different privileges because of a previous license. The PRSG as I understand it, is concerned with users abusing the band with high power equipment and wants to "Self Police" the band.

c. Providing an online database of users who are grandfathered in with special privileges only allows "vandals" to go online and find a "grandfathered" user's FCC callsign and begin using those privileges specified and the callsign. Grandfathering has seemed to work up to this point, thus there is no need for change.

d. Who would know if the person was the actual FCC licensee or a person who stole the FCC license ?

12. In regards to the identification of FCC authorized stations with an FCC callsign once again; The chances of a user actually identifying as stated on a license and actually doing so are two different things. I am not exactly sure as to who the higher ERP limits, other special privileges are for but most users who are business users from listening to a scanner, fail to identify. Public safety bands on the other hand always identify some every 30 minutes some after each communications end. Requiring a business or requesting a business or other users of the frequencies to "ID" ever so often will be almost impossible if you put into place a little setting of a large factory with several hundred employees. Each employee has a radio and can contact their supervisor or other personnel. Each user considers the radio they are using to be a on a "private frequency", unshared by anyone else, and they were just told when they got the radio "Here have a radio if you need anything just yell at us." They are never notified of proper procedures, FCC License ID, other users who might use the frequencies. The point I am attempting to make is that employees are "dumb" in regards to FCC licenses, and radio communications. They get communications inside the plant to talk about what they want.

13. I however agree with the PRSG, if the commission moves toward reinstating the licensing of such stations that "The FCC should not permit any entity not previously licensed for the frequencies now

allocated to MURS to acquire such a license. Nor should any entity previously licensed for these frequencies be permitted to add any new conditions that would exceed the current privileges of MURS operations."

IV. Certification

14. I certify that we are willing to receive replies to this PETITION by electronic means at: ramjl@earthlink.net

Michael E. Dickerson

"I certify that on this date (July 10, 2003), I have sent a copy of these comments to the following party:

"Corwin D. Moore, Jr.
Personal Radio Steering Group Inc.
PO Box 2851
Ann Arbor, MI 48106

[sent electronically by petitioner's permission to:
prsg@provide.net]"